

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

EUCLIDES SOTO, LOUIS A. MARTINEZ,	)	
JOSE RAMIREZ, CLEMENTE HERNANDEZ,	)	
CESAR PIZARO, ELISON PENA,	)	
JUAN COLON, JOSE ORTIZ, RAFAEL TORRES,	)	
ANGEL BAEZ, ANTONIO MARTINEZ,	)	
WILFREDO ORTIZ, EULOGIO ORTIZ,	)	Civil Action No.
MIRRAIN MIRANDA, RAFAEL MORENO,	)	04-10892-JLT
NELSON ACEVEDO, and	)	
RAMON RODRIQUEZ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
SHERMAN-FEINBERG CORPORATION,	)	
FARNSWORTH FIBRE CORPORATION,	)	
and UNITED STEELWORKERS OF AMERICA,	)	
LOCAL 421-U,	)	
	)	
Defendants.	)	

**JOINT SCHEDULING STATEMENT**

The parties, in accordance with the notice of scheduling conference in the above-titled case and Local Rule 16.1, hereby propose the following joint discovery plan:

1. All discovery shall be completed by May 15, 2005.
2. All expert witness information shall be disclosed no later than April 15, 2005.

3. Motions for summary judgment, if appropriate, shall be filed no later than July 1, 2005.

4. If trial is necessary, case to be tried in December, 2005.

Respectfully submitted,

s/Harold L. Lichten

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Dated: December 29, 2004

#### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served by first class mail, postage prepaid on the attorney of record for each party on December 29, 2004.

s/Harold L. Lichten

Harold L. Lichten